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17 UNITED STATES DISTRICT COURT
18 FOR THE NORTHERN DISTRICT OF GEORGIA

19 SECURITIES AND EXCHANGE
20 COMMISSION,
21 Plaintiff,

22 vs.

23 GERALD P. ALEXANDER,
24 CJB CONSULTING, INC., and
25 REGIS FILIA HOLDINGS, INC.,
26 Defendants.

No. 1:09-cv-0805

COMPLAINT

27 Plaintiff Securities and Exchange Commission ("Commission") alleges for
28 its Complaint as follows:

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I. INTRODUCTION

1. Defendant Gerald P. Alexander, a resident of Alpharetta, Georgia, acting on behalf of and through two corporations, defendants CJB Consulting, Inc. and Regis Filia Holdings, Inc., offered and sold shares of stock of at least thirteen corporations to investors in numerous transactions, when no registration statements were filed or in effect with the Commission for the transactions and no exemption from registration was available. Alexander effected these transactions through various brokerage accounts held in the names of CJB Consulting and Regis Filia Holdings for which Alexander had trading authority. As a result of this conduct, each of the defendants violated the securities registration provisions of Sections 5(a) and 5(c) of the Securities Act of 1933 (“Securities Act”) [15 U.S.C. § 77e (a) and (c)].

2. In addition Alexander, CJB Consulting, and Regis Filia Holdings engaged in a regular business of buying and selling securities for their own accounts when they were not registered as dealers with the Commission. As a result of this conduct, Alexander, CJB Consulting, and Regis Filia Holdings each acted as an unregistered dealer and violated Section 15(a)(1) of the Securities Exchange Act of 1934 (“Exchange Act”) [15 U.S.C. § 78o(a)(1)].

3. Alexander, CJB Consulting, and Regis Filia Holdings, directly and indirectly, have engaged in, and unless restrained and enjoined by this Court, will in the future engage in, transactions, acts, practices, and courses of business that violate Sections 5(a) and 5(c) of the Securities Act and Section 15(a)(1) of the Exchange Act.

4. The Commission brings this action pursuant to the authority conferred upon it by Section 20(b) of the Securities Act [15 U.S.C. § 77t(b)] and Sections 21(d) and (e) of the Exchange Act [15 U.S.C. § 78u(d) and (e)], and seeks entry of an order: (1) finding that the defendants violated the provisions of the federal securities laws alleged in this complaint; (2) permanently restraining and

1 enjoining the defendants from future violations of the federal securities laws that
2 they violated; (3) requiring each of defendant to prepare an accounting of the ill-
3 gotten gains obtained as a result of their conduct; (4) requiring the defendants to
4 disgorge their ill-gotten gains, including pre-judgment and post-judgment interest;
5 and (5) granting other equitable relief.

6 5. The Commission also seeks entry of an order requiring each defendant
7 to pay civil penalties pursuant to Section 20(d) of the Securities Act [15 U.S.C. §
8 77t(d)] and Section 21(d)(3) of the Exchange Act [15 U.S.C. Section §
9 78u(d)(3)].

10 6. The Commission also seeks entry of an order pursuant to Section
11 20(g) of the Securities Act [15 U.S.C. § 77t (g)] and Section 21(d) (6) of the
12 Exchange Act [15 U.S.C. § 78u (d) (6)] barring each defendant from participating
13 in the offering of penny stock.

14 **II. THE DEFENDANTS**

15 7. **Gerald P. Alexander** (“Alexander”), age 61, resides in Alpharetta,
16 Georgia.

17 8. **CJB Consulting, Inc.** (“CJB Consulting”) was originally incorporated
18 in Georgia in June 1999, and subsequently incorporated in Texas in February
19 2004 and in Minnesota in June 2006. CJB Consulting operated from Alexander’s
20 residence in Alpharetta, Georgia.

21 9. **Regis Filia Holdings, Inc.** (“Regis Filia Holdings”) was originally
22 incorporated in Georgia in May 2002, and subsequently incorporated in Texas in
23 March 2004, Pennsylvania in November 2004, and Minnesota in July 2006.
24 Regis Filia Holdings operated from Alexander’s residence in Alpharetta, Georgia.

25 **III. JURISDICTION AND VENUE**

26 10. Alexander, CJB Consulting, and Regis Filia Holdings engaged in
27 certain of the transactions, acts, practices, and courses of business constituting
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1 violations of federal securities laws alleged in this Complaint within this judicial
2 district.

3 11. In connection with the transactions, acts, practices, and courses of
4 business described in this Complaint, each of the defendants, directly and
5 indirectly, have made use of the means or instrumentalities of interstate
6 commerce, of the mails, or of the means and instruments of transportation or
7 communication in interstate commerce.

8 12. This Court has jurisdiction over this action pursuant to Section 22(a)
9 of the Securities Act [15 U.S.C. § 77v (a)] and Sections 21(e) and 27 of the
10 Exchange Act [15 U.S.C. §§ 78u (e) and 78aa].

11 13. Venue is proper in the Northern District of Georgia under Section
12 22(a) of the Securities Act and Section 27 of the Exchange Act. [15 U.S.C. §§
13 77v (a) and 78aa]

14 **IV. ALEXANDER CONTROLLED THE CORPORATIONS**

15 CJB Consulting

16 14. Lauren Alexander (referred to in this Complaint as “Lauren
17 Alexander”) is the daughter of defendant Alexander.

18 15. Lauren Alexander was born in 1981.

19 16. From 2005 through 2008, Lauren Alexander was a college student.

20 17. From 2005 through 2008, Lauren Alexander was not an accredited
21 investor, because she did not have a net worth that exceeded \$1,000,000 or
22 income in excess of \$200,000.

23 18. During 2005 through 2008, Lauren Alexander was the president,
24 director, and shareholder of CJB Consulting.

25 19. During 2005 through 2008, CJB Consulting was not an accredited
26 investor because its shareholder, Lauren Alexander, was not an accredited
27 investor.
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1 20. Although Lauren Alexander was identified as the nominal officer and
2 director of CJB Consulting, Alexander operated the business and made all
3 decisions for that corporation.

4 21. At all times material to this complaint, Gerald Alexander controlled
5 and directed the actions of CJB Consulting that are alleged in this Complaint.

6 22. As a corporation, CJB Consulting was responsible for the acts and
7 actions of Alexander, who acted as its agent or attorney-in-fact.

8 23. In or about January 2005, CJB Consulting opened a brokerage account
9 2988-xxxx at Bishop Rosen & Co., Inc. (“Bishop Rosen”) located in New York,
10 New York.

11 24. Alexander had authority to buy and sell securities in CJB Consulting’s
12 brokerage account at Bishop Rosen.

13 25. In June 2005, CJB Consulting opened a brokerage account 57R-
14 01xxxx at Leeb Brokerage Services Inc. (“Leeb”) located in New York, New
15 York. The account number for this account later changed to 2384-xxxx in 2006.

16 26. Alexander had authority to buy and sell securities in CJB Consulting’s
17 brokerage accounts at Leeb.

18 27. In June 2006, CJB Consulting opened a brokerage account 7352-xxxx
19 at WestPark Capital, Inc. (“WestPark”) located in Los Angeles, California (office
20 servicing account was in Boca Raton, Florida).

21 28. Alexander had authority to buy and sell securities in CJB Consulting’s
22 brokerage account number 7352-xxxx at WestPark.

23 29. In June 2006, CJB Consulting opened a brokerage account 4158-xxxx
24 at Charles Schwab & Co. (“Charles Schwab”) located in San Francisco,
25 California.

26 30. Alexander had authority to buy and sell securities in CJB Consulting’s
27 brokerage account a Charles Schwab.

1 31. In January 2007, CJB Consulting opened a brokerage account
2 5CL7xxx at Hudson Securities, Inc. (“Hudson Securities”) located in Jersey City,
3 New Jersey.

4 32. Alexander had authority to buy and sell securities in CJB Consulting’s
5 brokerage account at Hudson Securities.

6 33. In January 2006, CJB Consulting opened brokerage account 2051-
7 xxxxxx at Spencer Edwards, Inc. (“Spencer Edwards”) located in Englewood,
8 Colorado. The account number later changed to 3215-xxxx.

9 34. Alexander had authority to buy and sell securities in CJB Consulting’s
10 brokerage account at Spencer Edwards.

11 35. In 2007, CJB Consulting owned a brokerage account 2204-xxxxxx at
12 Scottsdale Capital Advisors (“Scottsdale Capital”) located in Scottsdale, Arizona.

13 36. Alexander had authority to buy and sell securities in CJB Consulting’s
14 brokerage account at Scottsdale Capital.

15 37. In 2006, CJB Consulting owned a brokerage account MLB0xxxxx at
16 Moneyline Brokers located in San Jose, Costa Rica.

17 38. Upon information and belief, Alexander had authority to buy and sell
18 securities in CJB Consulting’s brokerage account at Moneyline Brokers.

19 Regis Filia Holdings

20 39. Lauren Alexander was the sole officer, director and shareholder of
21 Regis Filia Holdings.

22 40. During 2005 through 2008, Regis Filia Holdings was not an
23 accredited investor because its shareholder, Lauren Alexander, was not an
24 accredited investor.

25 41. Although Lauren Alexander was identified as the nominal officer and
26 director of Regis Filia Holdings, Alexander operated the business and made all
27 decisions for that corporation.

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1 42. At all times material to this complaint, Alexander controlled and
2 directed the actions of Regis Filia Holdings that are alleged in this Complaint.

3 43. As a corporation, Regis Filia Holdings was responsible for the actions
4 of Alexander, who acted as its agent and attorney-in-fact.

5 44. In or about October 2005, Regis Filia Holdings opened a brokerage
6 account 57R-02xxxx at Leeb located in New York, New York and gave
7 Alexander trading authority over that account. The account number for this
8 account later changed to 1529-xxxx.

9 45. In 2006, Regis Filia Holdings owned a brokerage account 3207-xxxx
10 at Bishop Rosen located in New York, New York and gave Alexander trading
11 authority over that account.

12 46. In or about August 2006, Regis Filia Holdings opened a brokerage
13 account 3547-xxxx at WestPark located in located in Los Angeles, California
14 (office servicing account was in Boca Raton, Florida) and gave Alexander trading
15 authority over that account.

16 **V. ALEXANDER, CJB CONSULTING, AND REGIS FILIA**
17 **HOLDINGS OFFERED AND SOLD SECURITIES WITH NO**
18 **REGISTRATION STATEMENT ON FILE OR IN EFFECT**

19 47. Between approximately March 2006 and March 2008, CJB Consulting
20 purchased shares of common stock directly or indirectly from the following
21 companies: Amelot Holdings, Inc., Cash Now Corp., Colusa Biomass Energy
22 Corp., FreeHand Systems International, Inc., Guestmetrics, Inc., Healthsonix,
23 Inc., Imperia Entertainment, Inc., KKS Venture Management, Inc. (formerly
24 known as Rheologics, Inc.), Latitude Industries, Inc., Lifeline Biotechnologies,
25 Inc., Muller Media, Inc., Produce Safety & Security International, Inc., and
26 Trendsetter Solar Products, Inc.

27 48. Between approximately March 2006 and March 2008, Regis Filia
28 Holdings purchased share of common stock directly or indirectly from the

1 following companies: Colusa Biomass Energy Corp., Imperia Entertainment, Inc.,
2 Lifeline Biotechnologies, Inc., and Trendsetter Solar Products, Inc.

3 49. The shares of stock of each of these companies listed in paragraphs 47
4 and 48 are “securities” as that term is defined in Section 2(a)(1) of the Securities
5 Act [15 U.S.C. § 77b(a)(1)].

6 50. The shares of stock of each of these companies listed in paragraphs
7 47 and 48 are “penny stock” as that term is defined in Exchange Act Rule 3a51-1,
8 17 C.F.R. § 240.3a51-1 (2006).

9 **A. Trendsetter Solar Products, Inc.**

10 51. Trendsetter Solar Products, Inc. (“Trendsetter”) was a Nevada
11 corporation. The company issued shares of common stock that traded under the
12 trading symbol “TSSP.”

13 52. Between June 21, and April 3, 2007, CJB Consulting bought at least
14 103,080,200 shares of Trendsetter directly or indirectly from the company. These
15 shares include 2,000,000 Trendsetter shares bought from Regis Filia Holdings on
16 or about October 11, 2006 for an unknown amount of compensation.

17 53. By means of interstate commerce or the mails, CJB Holdings
18 deposited those shares of Trendsetter into its brokerage accounts at Leeb,
19 WestPark, Bishop Rosen, Spencer Edwards, Scottsdale Capital Partners,
20 Moneyline Brokers, and Charles Schwab.

21 54. Between approximately June 27, 2006, and November 19, 2007, CJB
22 Consulting offered and sold at least 89,080,200 shares of Trendsetter through its
23 brokerage accounts for approximately \$285,106.

24 55. On or about July 24, August 15, 18, 30, September 1, October 13,
25 December 11, and 22, 2006, CJB Consulting sold a total of 12,000,000
26 Trendsetter shares to BX Holdings Inc. for unknown amount of compensation.

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1 56. On August 18, and September 11, 2006, CJB Consulting sold a total
2 of 200,000 and 100,000 Trendsetter shares respectively to Peter Del Bove and
3 John Wise for unknown amounts of compensation.

4 57. On September 26, 2006, CJB Consulting sold a total of 1,700,000
5 Trendsetter shares to Patrick Murray for an unknown amount of compensation.

6 58. Alexander directly or indirectly offered and sold the 103,080,200
7 shares of Trendsetter identified in paragraphs 54, 55, 56 and 57 either through
8 CJB Consulting's brokerage accounts or in private transactions.

9 59. Alexander, as an agent of CJB Consulting, was a substantial and
10 necessary participant in these offers and sales of shares of Trendsetter by CJB
11 Consulting because he made the decision to offer and sell the shares and directed
12 the stock brokers to sell the shares in CJB Consulting's brokerage accounts.

13 60. Between August 17, and December 18, 2006, Regis Filia Holdings
14 bought a total of 27,000,000 shares of Trendsetter directly from the company.

15 61. By means of interstate commerce or the mails, Regis Filia Holdings
16 deposited those Trendsetter shares into its brokerage accounts at Leeb, WestPark,
17 and Bishop Rosen.

18 62. Between approximately November 30, 2006, and January 30, 2007,
19 Regis Filia Holdings offered and sold at least 11,619,800 shares of Trendsetter
20 through its brokerage accounts for approximately \$46,428.

21 63. On or about October 11, 2006, Regis Filia Holdings sold 2,000,000
22 Trendsetter shares to CJB Consulting for an unknown amount of compensation.

23 64. On or about October 9, 2006, Regis Filia Holdings sold a total of
24 4,080,200 Trendsetter shares to Ann Holmes for an unknown amount of
25 compensation.

26 65. On October 30, 2006, January 17 and 18, 2007, Regis Filia Holdings
27 sold a total of 9,300,000 Trendsetter shares to BX Holdings Inc. for an unknown
28 amount of compensation.

1 66. Alexander directly or indirectly offered and sold the 27,000,000 shares
2 of Trendsetter identified in paragraphs 62, 63, 64 and 65 either through Regis
3 Filia Holdings' brokerage accounts or in private transactions.

4 67. Alexander, as an agent of Regis Filia Holdings, was a substantial and
5 necessary participant in these offers and sales of shares of Trendsetter by Regis
6 Filia Holdings because he made the decision to offer and sell the shares and
7 directed the stock brokers to sell the shares in Regis Filia Holdings' brokerage
8 accounts.

9 68. Alexander, CJB Consulting, and Regis Filia Holdings directly or
10 indirectly offered and sold shares of Trendsetter by means of interstate commerce
11 or the mails when no registration statement was filed or in effect for their
12 transactions.

13 **B. Amelot Holdings Inc.**

14 69. Amelot Holdings, Inc. ("Amelot") was a Wyoming corporation. The
15 company's shares of common stock traded under the trading symbol "AMHD."

16 70. Between March 23, 2007 and August 8, 2007, CJB Consulting bought
17 200,948,000 shares of Amelot directly from the company.

18 71. By means of interstate commerce or the mails, CJB Holdings
19 deposited those shares of Amelot into its brokerage accounts at Hudson Securities
20 and WestPark Securities.

21 72. Between April 5, 2007, and September 13, 2007, CJB Consulting
22 offered and sold at least 176,948,000 shares of Amelot through its brokerage
23 accounts at Hudson Securities and WestPark Securities for proceeds of
24 approximately \$476,406.

25 73. On April 3, 2007, CJB Consulting sold 10,000,000 shares of Amelot
26 to Peter Kolacz in exchange for an unknown amount of compensation.

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1 74. On April 12, 2007, CJB Consulting sold 9,000,000 shares of Amelot
2 to an unknown person or entity in exchange for unknown amount of
3 compensation.

4 75. On April 26, 2007, CJB Consulting sold 5,000,000 shares of Amelot
5 to an unknown person or entity in exchange for unknown amount of
6 compensation.

7 76. Alexander directly or indirectly offered and sold the 200,948,000
8 shares of Amelot identified in paragraphs 72, 73, 74, and 75 either through CJB
9 Consulting's brokerage accounts or in private transactions.

10 77. Alexander, as an agent of CJB Consulting, was a substantial and
11 necessary participant in these offers and sales of Amelot's shares by CJB
12 Consulting because he made the decision to offer and sell the shares and directed
13 the stock brokers to sell the shares in CJB Consulting's brokerage accounts.

14 78. Alexander and CJB Consulting directly or indirectly offered and sold
15 shares of Amelot by means of interstate commerce or the mails when no
16 registration statement was filed or in effect for their transactions.

17 **C. Cash Now Corporation.**

18 79. Cash Now Corporation ("Cash Now") was a Nevada corporation that
19 operated from offices in Fort Lauderdale, Florida. The company's shares of
20 common stock traded under the trading symbol "CHNW."

21 80. Between approximately January 26, and April 4, 2007, CJB
22 Consulting purchased at least 108,700,000 shares of Cash Now directly or
23 indirectly from the company.

24 81. By means of interstate commerce or the mails, CJB Consulting caused
25 the share certificates for those Cash Now shares to be deposited into its brokerage
26 account at Hudson Securities.

27 82. Between approximately February 8, and April 16, 2007, CJB
28 Consulting offered and sold at least 108,700,000 shares of Cash Now through the

1 brokerage accounts at Hudson Securities and WestPark Securities for
2 approximately \$60,242.

3 83. Alexander directly or indirectly offered and sold the 108,700,000
4 shares of Cash Now identified in paragraph 82 through CJB Consulting's
5 brokerage account.

6 84. Alexander, as an agent of CJB Consulting, was a substantial and
7 necessary participant in these offers and sales of Cash Now shares by CJB
8 Consulting because he made the decision to offer and sell the shares and directed
9 the stock brokers to sell the shares in CJB Consulting's brokerage account.

10 85. Alexander and CJB Consulting directly or indirectly offered and sold
11 the shares of Cash Now by means of interstate commerce or the mails when no
12 registration statement was filed or in effect for their transactions.

13 **D. Colusa Biomass Energy Corporation**

14 86. Colusa Biomass Energy Corporation ("Colusa") was a Nevada
15 corporation that operated from offices in Colusa, California. The company's
16 shares of common stock traded under the trading symbol "CLME."

17 87. Between approximately May 16, and August 18, 2006, CJB
18 Consulting bought at least 7,700,000 shares of Colusa directly or indirectly from
19 the company and received an additional 250,000 shares on September 1, 2006.

20 88. By means of interstate commerce or the mails, CJB Consulting caused
21 the share certificates for those shares to be deposited into its brokerage accounts
22 at Leeb, Bishop Rosen, Charles Schwab, WestPark, and Spencer Edwards.

23 89. Between approximately May 18, 2006 and January 14, 2007, CJB
24 Consulting offered and sold at least 5,075,000 shares of Colusa through its
25 brokerage accounts for approximately \$185,419.

26 90. On August 15, 2006, CJB Consulting sold 250,000 shares of Colusa to
27 Patrick Murray in exchange for an unknown amount of compensation.

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1 91. On August 18, and September 11, 2006, CJB Consulting sold a total
2 of 150,000 and 75,000 shares of Colusa to Peter Del Bove and John Wise
3 respectively for unknown amounts of compensation.

4 92. On August 31, and September 15, 2006, CJB Consulting sold
5 2,000,000 shares of Colusa to BX Holdings, Inc. for an unknown amount of
6 compensation.

7 93. On October 9, 2006, CJB Consulting sold 400,000 shares of Colusa to
8 Ann Holmes in exchange for an unknown amount of compensation.

9 94. Alexander directly or indirectly offered and sold the 7,950,000 shares
10 of Colusa identified in paragraphs 89 through 93 through CJB Consulting's
11 brokerage accounts and in private transactions.

12 95. Alexander, as an agent of CJB Consulting, was a substantial and
13 necessary participant in these offers and sales of Colusa shares by CJB
14 Consulting because he made the decision to offer and sell the shares, and directed
15 the stock brokers to sell the shares in CJB Consulting's brokerage accounts.

16 96. On or about August 18, 2006, Regis Filia Holdings bought 779,412
17 shares of Colusa directly from the company.

18 97. By means of interstate commerce or the mails, Regis Filia Holdings
19 caused the share certificates for those shares to be deposited into its brokerage
20 account at Bishop Rosen.

21 98. On October 9, 2006, Regis Filia Holdings sold 600,000 shares of
22 Colusa to Ann Holmes in exchange for an unknown amount of compensation.

23 99. On November 27, 2006, Regis Filia Holdings offered and sold
24 179,412 shares of Colusa for approximately \$4,431.

25 100. Alexander directly or indirectly offered and sold the 779,412 shares of
26 Colusa identified in paragraphs 98 and 99 through Regis Filia Holdings'
27 brokerage account and in private transactions.

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1 101. Alexander, as an agent of Regis Filia Holdings, was a substantial and
2 necessary participant in these offers and sales of Colusa shares by Regis Filia
3 Holdings because he made the decision to offer and sell the shares, and directed
4 the stock brokers to sell the shares in Regis Filia Holdings' brokerage account.

5 102. Alexander, CJB Consulting, and Regis Filia Holdings directly or
6 indirectly offered and sold the shares of Colusa by means of interstate commerce
7 or the mails when no registration statement was filed or in effect for their
8 transactions.

9 **E. Lifeline Biotechnologies, Inc.**

10 103. Lifeline Biotechnologies, Inc. ("Lifeline") was a Nevada corporation.
11 The company issued shares of common stock that traded under the trading
12 symbol "LBTN."

13 104. Between approximately February 1, 2006 and January 26, 2007, Regis
14 Filia Holdings bought approximately 1,270,000,000 shares of Lifeline directly or
15 indirectly from Lifeline. Regis Filia Holdings also received 538,500 shares of
16 Lifeline on May 3, 2006 as a result of a stock split and 1,500,000 shares on May
17 26, 2006 as a dividend.

18 105. By means of interstate commerce or the mails, Regis Filia Holdings
19 caused the share certificates for these 1,270,000,000 shares to be delivered to its
20 brokerage accounts at Bishop Rosen, Leeb, and WestPark.

21 106. Between February 1, 2006 and April 9, 2007, Regis Filia Holdings
22 sold at least 1,022,038,500 of these shares of Lifeline through its brokerage
23 accounts at Bishop Rosen, Leeb and WestPark for approximately \$283,607.

24 107. On or about January 19, 2007, Regis Filia Holdings sold 50,000,000
25 shares from its account at WestPark to an unknown person for an unknown
26 amount of compensation.

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1 108. On or about March 7, 2007, Regis Filia Holdings sold 200,000,000
2 shares from its account at WestPark to CJB Consulting for an unknown amount of
3 compensation.

4 109. Alexander directly or indirectly offered and sold the 1,272,038,500
5 shares of Lifeline identified in paragraphs 106, 107 and 108 either through Regis
6 Filia Holdings' brokerage accounts or in private transactions.

7 110. Alexander, as an agent of Regis Fila Holdings, was a substantial and
8 necessary participant in these sales of Lifeline shares by Regis Fila Holdings
9 because he made the decision to offer and sell the shares and directed the stock
10 brokers to sell the shares in Regis Fila Holdings' brokerage accounts.

11 111. Between approximately April 13, 2006 and August 13, 2007, CJB
12 Consulting bought approximately 5,682,050,000 shares of Lifeline directly or
13 indirectly from the company. CJB Consulting also received 750,000 Lifeline
14 shares on May 25, 2006 as a result of a stock split and 750,000 Lifeline shares on
15 March 26, 2006 as a stock dividend. CJB Consulting also bought an additional
16 200,000,000 shares from Regis Filia Holdings

17 112. By means of interstate commerce or the mails, CJB Consulting caused
18 the share certificates for these 5,682,050,000 shares to be delivered to its
19 brokerage accounts at Bishop Rosen, Leeb, Charles Schwab, Hudson Securities,
20 Spencer Edwards, and WestPark.

21 113. Between April 13, 2006 and September 4, 2007, CJB Consulting sold
22 2,061,757,111 shares of Lifeline through its brokerage accounts at Bishop Rosen,
23 Leeb, Charles Schwab, Hudson Securities, Spencer Edwards, and WestPark for
24 approximately \$446,408.

25 114. On March 8, and April 9, 2007, CJB Consulting sold a total of
26 550,000,000 shares from its account at WestPark to Peter Kolacz for an unknown
27 amount of compensation.

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1 115. On March 19, 2007, CJB Consulting sold 300,000,000 shares from its
2 account at WestPark to an unknown person for an unknown amount of
3 compensation.

4 116. On March 23, and April 9, 2007, CJB Consulting sold a total of
5 590,000,000 shares from its account at WestPark to an unknown person for an
6 unknown amount of compensation.

7 117. Alexander directly or indirectly offered and sold the 3,501,757,111
8 shares of Lifeline identified in paragraphs 113, 114, 115 and 116 either through
9 CJB Consulting's brokerage accounts or in private transactions.

10 118. Alexander, as an agent of CJB Consulting, was a substantial and
11 necessary participant in these sales of Lifeline shares by CJB Consulting because
12 he made the decision to offer and sell the shares and directed the stock brokers to
13 sell the shares in CJB Consulting's brokerage accounts.

14 119. Alexander, Regis Filia Holdings, and CJB Consulting each directly or
15 indirectly offered and sold shares of Lifeline by means of interstate commerce or
16 the mails when no registration statement was filed or in effect for the transactions.

17 **F. Freehand Systems International, Inc.**

18 120. Freehand Systems International, Inc. ("Freehand") was a Delaware
19 corporation. The company issued shares of common stock that traded under the
20 trading symbol "FSYI."

21 121. Between March and July 2006, CJB Consulting bought at least
22 1,075,000 shares of Freehand directly from the company.

23 122. On or about June 16, 2006, CJB Consulting purchased at least 750,000
24 of the Freehand shares by executing a promissory note for payment of \$75,000 on
25 or before July 31, 2006.

26 123. By means of interstate commerce or the mails, CJB Consulting caused
27 the share certificates for 325,000 Freehand shares to be delivered to its brokerage
28

1 accounts at Bishop Rosen, Charles Schwab, Leeb, Spencer Edwards and
2 WestPark.

3 124. Between March 13, and August 25, 2006, CJB Consulting sold at least
4 137,000 shares of Freehand through its brokerage accounts for approximately
5 \$234,930.

6 125. On March 20, 2006, CJB Consulting sold 150,000 shares of Freehand
7 from its account at Bishop Rosen to Danzig, Ltd. for an unknown amount of
8 compensation.

9 126. On or about June 30, 2006, CJB Consulting sold 250,000 Freehand
10 shares to Black Cat Consulting, Inc. and 100,000 Freehand shares to Brian
11 Volmer for unknown amounts of consideration.

12 127. On or about August 22, 2006, CJB Consulting sold 250,000 Freehand
13 shares to Global Investment Holdings LLC., 60,000 Freehand shares to Imperial
14 Consulting Network, Inc., and 40,000 Freehand shares to Frederick Nader for
15 unknown amounts of consideration.

16 128. On August 31, 2006, CJB Consulting sold 25,000 shares of Freehand
17 from its account at WestPark to David Kagel for an unknown amount of
18 compensation.

19 129. Alexander directly or indirectly offered and sold at least 1,012,000
20 shares of Freehand identified in paragraphs 124 through 127 through CJB
21 Consulting's brokerage accounts or in private transactions.

22 130. Alexander, as an agent of CJB Consulting, was a substantial and
23 necessary participant in these sales of Freehand shares because he made the
24 decision to offer and sell the shares and directed the stock brokers to sell the
25 shares in CJB Consulting's brokerage account.

26 131. During April 2006, Regis Filia Holdings bought 11,000,000 shares of
27 Freehand directly from the company.

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1 132. By means of interstate commerce or the mails, Regis Filia Holdings
2 caused the share certificates for these 5,000,000 and 6,000,000 shares to be
3 delivered to brokerage accounts at Bishop Rosen and Leeb respectively.

4 133. Regis Filia Holdings sold 4,900,000 shares of Freehand to BX
5 Holdings, Inc. on April 19, 2006, for an unknown amount of consideration, and
6 the remaining 100,000 shares for approximately \$35 in August 2006.

7 134. On April 27 and 28, 2006, Regis Filia Holdings sold 6,000,000 shares
8 of Freehand for approximately \$40,555.

9 135. Alexander directly or indirectly offered and sold the 11,000,000 shares
10 of Freehand identified in paragraphs 133 and 134 either through Regis Filia
11 Holdings' brokerage accounts or in private transactions.

12 136. Alexander, as an agent of Regis Filia Holdings, was a substantial and
13 necessary participant in these sales of Freehand shares because he made the
14 decision to offer and sell the shares and directed the stock brokers to sell the
15 shares in Regis Filia Holdings' brokerage accounts.

16 137. Alexander, Regis Filia Holdings, and CJB Consulting each directly or
17 indirectly offered and sold shares of Freehand by means of interstate commerce
18 or the mails when no registration statement was filed or in effect for the
19 transactions.

20 **G. Guestmetrics Inc.**

21 138. Guestmetrics, Inc. ("Guestmetrics") was a Delaware corporation. The
22 company issued shares of common stock that traded under the trading symbol
23 "GESM."

24 139. On or about November 17, 2006, CJB Consulting bought at least
25 2,200,000 shares of Guestmetrics directly from the company.

26 140. By means of interstate commerce or the mails, CJB Consulting caused
27 700,000 Guestmetrics shares to be delivered to its brokerage accounts at Charles
28 Schwab, and later transferred 25,000 of those shares to its account at WestPark.

1 141. Between January 12, and July 26, 2007, CJB Consulting sold at least
2 150,000 shares of Guestmetrics through its brokerage accounts for approximately
3 \$5,222.

4 142. On January 12, 2007, CJB Consulting sold 550,000 shares of
5 Guestmetrics from its account at Bishop Rosen to Julian Taylor for an unknown
6 amount of compensation.

7 143. Alexander directly or indirectly offered and sold at least 700,000
8 shares of Guestmetrics identified in paragraphs 141 and 142 through CJB
9 Consulting's brokerage accounts or in private transactions.

10 144. Alexander, as an agent of CJB Consulting, was a substantial and
11 necessary participant in these sales of Guestmetrics shares because he made the
12 decision to offer and sell the shares and directed the stock brokers to sell the
13 shares in CJB Consulting's brokerage account.

14 145. Alexander and CJB Consulting each directly or indirectly offered and
15 sold shares of Guestmetrics by means of interstate commerce or the mails when
16 no registration statement was filed or in effect for the transactions.

17 **H. Healthsonix, Inc.**

18 146. Healthsonix, Inc. ("Healthsonix") was a Nevada corporation. The
19 company issued shares of common stock that traded under the trading symbol
20 "HSXI."

21 147. On or about January 23, and April 27, 2007, CJB Consulting bought a
22 total of 11,000,000 shares of Healthsonix directly from the company.

23 148. By means of interstate commerce or the mails, CJB Consulting caused
24 11,000,000 Healthsonix shares to be delivered to its brokerage accounts at
25 Charles Schwab, and later transferred 552,506 of those shares to its account at
26 WestPark.

1 149. Between February 26 and June 19, 2007, CJB Consulting sold at least
2 355,494 shares of Healthsonix through its Charles Schwab account for
3 approximately \$103,015.

4 150. On February 16, and 20, 2007, CJB Consulting sold 4,110,000 shares
5 of Healthsonix to Bottom Line Associates and 1,000,000 Healthsonix shares to
6 Cumbuco Beach, Inc. BVI for unknown amounts of compensation.

7 151. Between August 27, 2007 and March 12, 2008, CJB Consulting sold
8 at least 436,898 shares of Healthsonix through its WestPark account for
9 approximately \$68,713.

10 152. Alexander directly or indirectly offered and sold at least 5,902,392
11 shares of Healthsonix identified in paragraphs 149, 150 and 151 through CJB
12 Consulting's brokerage accounts or in private transactions.

13 153. Alexander, as an agent of CJB Consulting, was a substantial and
14 necessary participant in these sales of Healthsonix shares because he made the
15 decision to offer and sell the shares and directed the stock brokers to sell the
16 shares in CJB Consulting's brokerage account.

17 154. Alexander and CJB Consulting each directly or indirectly offered and
18 sold shares of Healthsonix by means of interstate commerce or the mails when no
19 registration statement was filed or in effect for the transactions.

20 **I. Imperia Entertainment, Inc.**

21 155. Imperia Entertainment, Inc. ("Imperia") was a Nevada corporation.
22 The company issued shares of common stock that traded under the symbol
23 "IPRE."

24 156. During March and April 2006, CJB Consulting bought at least
25 9,830,500 shares of Imperia directly from the company.

26 157. By means of interstate commerce or the mails, CJB Consulting caused
27 the share certificates for these 9,830,500 shares to be delivered to its brokerage
28 account at Leeb.

1 158. Between March 16, and April 20, 2006, CJB Consulting sold
2 9,830,000 shares of Imperia for approximately \$35,755.

3 159. Alexander directly or indirectly offered and sold the 9,830,000 shares
4 of Imperia identified in paragraph 158 through CJB Consulting's brokerage
5 account.

6 160. Alexander, as an agent of CJB Consulting, was a substantial and
7 necessary participant in these sales of Imperia shares because he made the
8 decision to offer and sell the shares and directed the stock brokers to sell the
9 shares in CJB Consulting's brokerage account.

10 161. During April 2006, Regis Filia Holdings bought 11,000,000 shares of
11 Imperia directly from the company.

12 162. By means of interstate commerce or the mails, Regis Filia Holdings
13 caused the share certificates for these 5,000,000 and 6,000,000 shares to be
14 delivered to brokerage accounts at Bishop Rosen and Leeb respectively.

15 163. Regis Filia Holdings sold 4,900,000 shares of Imperia to BX Holdings
16 Inc. on April 19, 2006, for an unknown amount of consideration, and the
17 remaining 100,000 shares through its Bishop Rosen account for approximately
18 \$35.

19 164. On April 27 and 28, 2006, Regis Filia Holdings sold 6,000,000 shares
20 of Imperia through its Leeb account for approximately \$4,765.

21 165. Alexander directly or indirectly offered and sold the 11,000,000 shares
22 of Imperia identified in paragraphs 163 and 164 either through Regis Filia
23 Holdings' brokerage accounts or in private transactions.

24 166. Alexander, as an agent of Regis Filia Holdings, was a substantial and
25 necessary participant in these sales of Imperia shares because he made the
26 decision to offer and sell the shares and directed the stock brokers to sell the
27 shares in Regis Filia Holdings' brokerage accounts.

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1 167. Alexander, Regis Filia Holdings, and CJB Consulting each directly or
2 indirectly offered and sold shares of Imperia by means of interstate commerce or
3 the mails when no registration statement was filed or in effect for the transactions.

4 **J. Rheologics Technologies, Inc.**

5 168. Rheologics Technologies, Inc. (“Rheologics”) was a Nevada
6 corporation. The company issued shares of common stock that traded under the
7 symbol “RTGI.” On or about July 25, 2007, the name of the company changed to
8 KKS Venture Management Inc. and the trading symbol changed to “KKS SV.”
9 However, the company is referred to in this Complaint as Rheologics.

10 169. During April 2007, CJB Consulting bought 9,795,000 shares of
11 Rheologics directly from the company.

12 170. By means of interstate commerce or the mails, CJB Consulting caused
13 7,000,000 shares to be delivered to its brokerage account at WestPark and
14 2,795,000 shares to be delivered to its brokerage account at Hudson Securities.

15 171. Between April 13, 2006, and July 30, 2008, CJB Consulting sold at
16 least 4,165,000 shares of Rheologics for approximately \$15,764.

17 172. On August 13, 2007, CJB Consulting sold 4,200,000 to ALLK, Inc.
18 and 1,425,000 shares to BX Holdings, Inc. for unknown amounts of
19 compensation.

20 173. Alexander directly or indirectly offered and sold the 9,790,000 shares
21 of Rheologics identified in paragraphs 171 and 172 through CJB Consulting’s
22 brokerage accounts.

23 174. Alexander, as an agent of CJB Consulting, was a substantial and
24 necessary participant in these sales of Rheologics shares because he made the
25 decision to offer and sell the shares and directed the stock brokers to sell the
26 shares in CJB Consulting’s brokerage accounts.

1 175. Alexander and CJB Consulting each directly or indirectly offered and
2 sold shares of Rheologics by means of interstate commerce or the mails when no
3 registration statement was filed or in effect for the transactions.

4 **K. Latitude Industries, Inc.**

5 176. Latitude Industries, Inc. (“Latitude”) was a Florida corporation. The
6 company issued shares of common stock that traded under the symbol “LTDI.”

7 177. Between May 18, 2007, and January 3, 2008, CJB Consulting bought
8 14,253,700 shares of Latitude directly from the company.

9 178. By means of interstate commerce or the mails, CJB Consulting caused
10 the share certificates for 14,253,700 shares to be delivered to its brokerage
11 account at Hudson Securities.

12 179. Between June 11, 2007, and January 17, 2008, CJB Consulting sold
13 14,253,700 shares of Latitude for approximately \$120,318.

14 180. Alexander directly or indirectly offered and sold the 14,253,700 shares
15 of Latitude identified in paragraph 179 through CJB Consulting’s brokerage
16 account.

17 181. Alexander, as an agent of CJB Consulting, was a substantial and
18 necessary participant in these sales of Latitude shares because he made the
19 decision to offer and sell the shares and directed the stock brokers to sell the
20 shares in CJB Consulting’s brokerage account.

21 182. Alexander and CJB Consulting each directly or indirectly offered and
22 sold shares of Latitude by means of interstate commerce or the mails when no
23 registration statement was filed or in effect for the transactions.

24 **L. Muller Media, Inc.**

25 183. Muller Media, Inc. (“Muller Media”) was a Nevada corporation. The
26 company issued shares of common stock that traded under the symbol “MLMD.”

27 184. Between July 12, 2006, and July 24, 2008, CJB Consulting bought at
28 least 100,000 shares of Muller Media directly or indirectly from the company

1 later received 300,000 shares in exchange for 100,000 shares as a result of a stock
2 split on July 14, 2006.

3 185. By means of interstate commerce or the mails, CJB Consulting caused
4 the share certificates for 100,000 shares and the shares received as a result of the
5 stock split to be delivered to its brokerage account at Leeb.

6 186. Between July 12, 2006, and July 30, 2006, CJB Consulting sold
7 300,000 shares of Muller Media for approximately \$4,543.

8 187. Alexander directly or indirectly offered and sold the 300,000 shares of
9 Muller Media identified in paragraph 197 through CJB Consulting's brokerage
10 account.

11 188. Alexander, as an agent of CJB Consulting, was a substantial and
12 necessary participant in these sales of Muller Media shares because he made the
13 decision to offer and sell the shares and directed the stock brokers to sell the
14 shares in CJB Consulting's brokerage account.

15 189. Alexander and CJB Consulting each directly or indirectly offered and
16 sold shares of Muller Media by means of interstate commerce or the mails when
17 no registration statement was filed or in effect for the transactions.

18 **M. Produce Safety & Security International, Inc.**

19 190. Produce Safety & Security International, Inc. ("Produce Safety") was
20 a Colorado corporation. The company issued shares of common stock that traded
21 under the symbol "PDSC."

22 191. Between approximately June 28, 2007, and November 13, 2007, CJB
23 Consulting bought 268,000,000 shares of Produce Safety directly or indirectly
24 from the company.

25 192. By means of interstate commerce or the mails, CJB Consulting caused
26 the share certificates for 268,000,000 shares to be delivered to its brokerage
27 account at Hudson Securities.

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1 193. Between approximately July 6, 2007, and November 17, 2007, CJB
2 Consulting sold 132,036,000 shares of Produce Safety for approximately \$40,474.

3 194. Alexander directly or indirectly offered and sold the 132,036,000
4 shares of Produce Safety identified in paragraph 193 through CJB Consulting's
5 brokerage account.

6 195. Alexander, as an agent of CJB Consulting, was a substantial and
7 necessary participant in these sales of Produce Safety shares because he made the
8 decision to offer and sell the shares and directed the stock brokers to sell the
9 shares in CJB Consulting's brokerage account.

10 196. Alexander and CJB Consulting each directly or indirectly offered and
11 sold shares of Produce Safety by means of interstate commerce or the mails when
12 no registration statement was filed or in effect for the transactions.

13 **N. CJB Consulting, Regis Filia Holdings and Alexander Acted as**
14 **Underwriters**

15 197. In the transactions described above, CJB Consulting, Regis Filia
16 Holdings, and Alexander participated in a scheme to evade the registration
17 provisions of the federal securities laws.

18 198. In the transactions described above, CJB Consulting, Regis Filia
19 Holdings and Alexander acted as underwriters because they acquired the shares of
20 the companies directly or indirectly from the issuers with the view to distribute
21 those shares through sales to other investors.

22 199. In the transactions described above, CJB Consulting, Regis Filia
23 Holdings and Alexander acted as part of chain of transactions that were part of a
24 plan or scheme to evade the registration provisions of the federal securities laws.

25 200. In the transactions described above, CJB Consulting, Regis Filia
26 Holdings and Alexander sold the shares of the companies after owning them for
27 less than twelve months.

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1 **VI. Alexander, CJB Consulting And Regis Filia Holdings Acted As**
2 **Unregistered Dealers In Violation Of Section 15(a) Of The Exchange**
3 **Act**

4 201. During the period from at least January 2006 and continuing through
5 March 2008, Alexander held himself out to the public and to the business
6 community as an “investment banker” and as a person who could assist
7 companies with raising capital through sales of stock.

8 202. During the period from at least January 2006 and continuing through
9 March 2008, Alexander was engaged at least part of his time, directly or
10 indirectly, in the business of offering, buying, selling or otherwise dealing or
11 trading in securities issued by another person.

12 203. During the period from at least January 2006 and continuing through
13 March 2008, Alexander bought and sold securities for the accounts of CJB
14 Consulting and Regis Filia Holdings in the regular course of business.

15 204. During the period from at least January 2006 and continuing through
16 March 2008, CJB Consulting was engaged at least part of its time, directly or
17 indirectly, in the business of offering, buying, selling or otherwise dealing or
18 trading in securities issued by another person.

19 205. During the period from at least January 2006 and continuing through
20 March 2008, CJB Consulting bought and sold securities in its brokerage accounts
21 in the regular course of its business.

22 206. During the period from at least January 2006 and continuing through
23 March 2008, Regis Filia Holdings was engaged at least part of its time, directly or
24 indirectly, in the business of offering, buying, selling or otherwise dealing or
25 trading in securities issued by another person.

26 207. During the period from at least January 2006 and continuing through
27 March 2008, Regis Filia Holdings bought and sold securities in its brokerage
28 accounts in the regular course of its business.

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FIRST CLAIM FOR RELIEF
Offer and Sale of Unregistered Securities
In Violation of Sections 5(a) and 5(c) of the Securities Act,
15 U.S.C. §§ 77e (a) and (c)

208. Paragraphs 1 through 200 are hereby realleged and incorporated by reference.

209. The shares of Amelot Holdings, Inc., Cash Now Corp., Colusa Biomass Energy Corp., FreeHand Systems International, Inc., Guestmetrics, Inc., Healthsonix, Inc., Imperia Entertainment, Inc., Rheologics Technologies, Inc., Latitude Industries, Inc., Lifeline Biotechnologies, Inc., Muller Media, Inc., Produce Safety & Security International, Inc., and Trendsetter Solar Products Inc. that the defendants offered and sold to public investors in the old companies are “securities” as that term is defined in Section 2(a)(1) of the Securities Act and Section 3(a)(10) the Exchange Act, 15 U.S.C. §§ 77b(a)(1) and 78c(a)(10).

210. Alexander, CJB Consulting, and Regis Filia Holdings, directly or indirectly, made use of the means or instruments of transportation or communication in interstate commerce or of the mails to sell securities through the use or medium of a prospectus or otherwise, or caused to be carried through the mails or in interstate commerce by any means or instruments of transportation, the securities described in this Complaint for the purpose of sale or for delivery after sale when no registration statement was in effect as to such securities.

211. Alexander, CJB Consulting, and Regis Filia Holdings, directly or indirectly, made use of the means or instruments of transportation or communication in interstate commerce or of the mails to offer to sell or offer to buy the securities described in this Complaint through the use or medium of a prospectus or otherwise, when no registration statement had been filed for such securities.

1 212. By reason of the foregoing conduct Alexander, CJB Consulting, and
2 Regis Filia Holdings have each violated and, unless restrained and enjoined, will
3 continue to violate Sections 5(a) and 5(c) of the Securities Act , 15 U.S.C. §§ 77e
4 (a) and (c).

5 **SECOND CLAIM FOR RELIEF**
6 **Engaging in Securities Transactions as a Dealer without Registration**
7 **In Violation of Section 15(a)(1) of the Exchange Act,**
8 **15 U.S.C. § 78o(a)(1)**

9 213. Paragraphs 1 through 207 are hereby realleged and incorporated by
10 reference.

11 214. Alexander, CJB Consulting, and Regis Filia Holdings, directly or
12 indirectly, engaged in the business of buying and selling securities, and made use
13 of the mails or a means or instrumentality of interstate commerce to effect
14 transactions in, or to induce or attempt to induce the purchase or sale of, the
15 securities described in this Complaint at a time when none of them were
16 registered with the Commission as dealers in accordance with Section 15(b) of
17 the Exchange Act, 15 U.S.C. § 78o(b).

18 215. By reason of the foregoing conduct Alexander, CJB Consulting, and
19 Regis Filia Holdings have each violated and, unless restrained and enjoined, will
20 continue to violate Section 15(a)(1) of the Exchange Act, 15 U.S.C. § 78o(a)(1).

21 **PRAYER FOR RELIEF**

22 WHEREFORE, the Commission respectfully request that the Court:

23 **I.**

24 Find that the defendants committed the violations alleged.

25 **II.**

26 Enter an Order of Permanent Injunction as to each defendant, in a form
27 consistent with Rule 65(d) of the Federal Rules of Civil Procedure, enjoining each
28

1 defendant from further violations of the provisions of law and rules alleged in this
2 complaint.

3 **III.**

4 Enter an Order requiring the defendants to prepare an accounting of the
5 proceeds they obtained from the unlawful transactions and activities described
6 above. .

7 **IV.**

8 Enter an Order requiring defendants to disgorge all ill-gotten gains
9 resulting from their participation in the conduct described above, including pre-
10 judgment, and post judgment interest.

11 **V.**

12 Enter an Order requiring each defendants to pay civil penalties pursuant to
13 Section 20(d) of the Securities Act and Section 21(d)(3) of the Exchange Act, 15
14 U.S.C. §§ 77t(d) and 78u(d)(3).

15 **VI.**

16 Enter an Order pursuant to Section 20(g) of the Securities Act and Section
17 21 of the Exchange Act, 15 U.S.C. §§ 77t(g) and 78u(d)(6) barring all defendants
18 from participating in any offering of penny stock
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VII.

Grant such other relief as this Court may deem just or appropriate.

DATED this 24th day of March, 2009.

Respectfully submitted,

s/ Leslie J. Hughes

Leslie J. Hughes
Securities and Exchange
Commission
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s/ William P. Hicks

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